

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION**

The Michelin Retirement Plan and the
Investment Committee of the Michelin
Retirement Plan,

Plaintiffs,

v.

Dilworth Paxson, LLP, BFG Socially
Responsible Investments, Ltd., Burnham
Financial Group, Inc., Burnham Securities,
Inc., COR Fund Advisors, LLC, GMT
Duncan, LLC, Greenberg Traurig, LLP,
Thorsdale Fiduciary and Guaranty
Company Ltd., U.S. Bank National
Association, Valor Group Ltd., Wakpamni
Lake Community Corp., Wealth-Assurance
AG, Wealth Assurance Private Client
Corporation, Timothy B. Anderson, Jon
Michael Burnham, Devon D. Archer,
Bevan T. Cooney, Hugh Dunkerley, Jason
W. Galanis, John P. Galanis, Gary T. Hirst,
Frankie D. Hughes, and Michelle A.
Morton,

Defendants.

Court File No. 6:16-cv-03604-HMH-JDA

**CONSENT MOTION OF
DEFENDANT U.S. BANK
NATIONAL ASSOCIATION
FOR EXTENSION OF TIME TO
ANSWER OR RESPOND**

Defendant U.S. Bank National Association (“U.S. Bank”), with the consent of
Plaintiffs The Michelin Retirement Plan and the Investment Committee of the Michelin
Retirement Plan, hereby moves for a twenty-one (21) day extension of time to answer,
move, or otherwise plead in response to the Complaint in this action.

U.S. Bank’s response to Plaintiffs’ Complaint is currently due on or before March
14, 2017. With Plaintiffs’ consent, U.S. Bank received two previous extensions of the

due date for its response. In light of Plaintiffs' motion to stay and the other motions currently pending in this action, U.S. Bank has sought and received Plaintiffs' consent to seek an additional twenty-one (21) day extension, which would require U.S. Bank to answer, move, or otherwise plead in response to the Complaint in this action on or before April 4, 2017. This extension would not affect other deadlines.

Respectfully submitted,

Dated: March 6, 2017

MCNAIR LAW FIRM, P.A.

By: s/Bernie W. Ellis

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**ATTORNEYS FOR DEFENDANT
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